

ESTTA Tracking number: **ESTTA196364**

Filing date: **03/05/2008**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91182084
Party	Defendant Deniz and Gunzel, Metin T. Deniz and Murat Guzel, Deniz and Guzel
Correspondence Address	DAMON A. NEAGLE DESIGN IP, P.C. 5100 W TILGHMAN ST STE 205 ALLENTOWN, PA 18104-9123  tm@designip.com
Submission	Answer
Filer's Name	Damon A. Neagle
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Date	03/05/2008
Attachments	Answer_to_Opposition.pdf ( 3 pages )(14123 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

POMWONDERFUL LLC,	:	
	:	
Opposer,	:	
	:	Opposition No. 91182084
v.	:	
	:	
METIN T. DENIZ AND	:	
MURAT GUZEL,	:	
	:	
Applicant.	:	

ANSWER TO CONSOLIDATED NOTICE OF OPPOSITION

Applicant Metin T. Deniz and Murat Guzel hereby submit its Answer to Consolidated Notice of Opposition as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 and, therefore, denies the same.
2. Applicant admits that Opposer is the record owner of the registrations identified in Paragraph 2. Applicant admits that Section 8 and Section 15 Affidavits have been submitted and accepted for Registration Nos. 2,637,053 and 2,640,835. Applicant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 2 and, therefore, denies the same.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 and, therefore, denies the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 and, therefore, denies the same.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 and, therefore, denies the same.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 and, therefore, denies the same.

7. Applicant admits the allegations contained in Paragraph 7.

8. Applicant admits the allegations contained in Paragraph 8.

9. Applicant admits the allegations contained in Paragraph 9.

10. Applicant admits the allegations contained in Paragraph 10.

11. Applicant denies the allegations contained in Paragraph 11.

### AFFIRMATIVE DEFENSES

Applicant asserts the following affirmative defenses:

1. There is no likelihood of confusion between the marks on which Opposer bases this opposition as identified in the Consolidated Notice of Opposition and Applicant's marks.

2. WHEREFORE, Applicant respectfully requests that the Opposition be dismissed in its entirety and that registrations be issued to the Applicant for Applicant's marks.

Respectfully submitted,

DESIGN IP, A PROFESSIONAL CORPORATION

Date: March 5, 2008

/Damon A. Neagle/  
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Certificate of Service

I hereby certify that a true and correct copy of the ANSWER TO CONSOLIDATED NOTICE OF OPPOSITION has been served via first class mail, postage prepaid, on this 5<sup>th</sup> day of March, 2008, upon:

Sharon A. Ceresnie  
LOEB & LOEB LLP  
321 North Clark Street, Suite 2300  
Chicago, IL 60610

/Damon A. Neagle/  
Damon A. Neagle